

## Granger Reis - Privacy Policy

### Overview

At Granger Reis, we are committed to respecting and protecting your privacy.

This policy explains when and why we collect personal information about people, how we use it, the conditions under which we may disclose to others and how we keep it secure. We may change this policy from time to time so please check our [website](#) for the most up to date version.

Any questions regarding this Policy and our privacy practices should be sent by email to [privacy@grangerreis.com](mailto:privacy@grangerreis.com) or by writing to Granger Reis, South Wing, 1 Redcliff Street, Bristol, BS1 6NP.

### Who are we?

Granger Reis are an executive search firm specialising in the Real Estate and Industrial sectors globally. Granger Reis is a limited company and the registered address is South Wing, 1 Redcliff Street, Bristol, BS1 6NP.

### Who do we collect information on?

There are four main categories of individuals that Granger Reis collect and process data on which are outlined below, where appropriate other areas of the privacy policy will be broken down into sub-sections to ensure the detail and relevance is clear for each category of individual.

<b>Clients</b>	This includes employees of past, present and prospective clients who utilise or could benefit from the services of Granger Reis.
<b>Candidates</b>	This includes all individuals who have been identified as potential candidates in connection with a search that we are conducting and for the purposes of market intelligence.
<b>Employees</b>	This includes all past, present and future employees of Granger Reis.
<b>Suppliers</b>	This includes employees of past, present and future suppliers or third parties Granger Reis may utilise in the operation of the business and delivering services to clients.

### Why do we collect the information about you?

Granger Reis collects, processes and distributes personal data only for it's own use and only where there is a lawful basis to do so. Such purposes include;

#### Employees

- **Recruitment (including on-boarding)** -Data processed for this purpose will require explicit consent
- **Payroll & Benefits (health insurance, childcare vouchers etc)**
- **Performance Management**
- **Absence Management**
- **Travel Management**
- **Health & Safety (such as details of Next of Kin)**  
Data collected, processed and distributed for these purposes is done so on the basis that it is necessary for the performance of a contract between Granger Reis and the employee, to comply with a legal obligation or it is in the vital interests of the employee.
- **Training / CPD**

#### Suppliers

- **Account Management**  
This includes but is not limited to;
  - to establish a service provision from you
  - to deal with enquiries and requests;
  - to contact you in the course of providing services;
  - to provide you with any other information that you request from us;

**Clients**

- **Account Management & Business Development**

This includes but is not limited to;

- to provide clients with, and to improve our services;
- to deal with enquiries and requests;
- to contact you in the course of providing services;
- to provide you with any other information that you request from us;
- to provide clients with information about our services, and to advise you of news and industry updates, events, reports and other information and to carry out customer experience reviews
- to approach potential clients regarding our products and services

**Candidates**

- **Executive, Board & Management Search**

Personal Data is collected, processed and distributed in order to match Candidates who are relevant for a particular position with client organisations, who often have an opening for such a position. We also may contact individuals from time to time to gather names or, or other personal information regarding potential candidates in connection with a search that we are conducting and for the purposes of market intelligence. The data may be sourced from public sites containing contact and CV data, from potential candidates directly, from interactions with potential candidates and other connected parties and from online sources and will be provided to Clients seeking to fill such roles.

- **Executive Assessment**

Personal Data is collected, processed and distributed with the intent of assessing a potential candidate's or employee's suitability, strengths and weaknesses for role and fit within company culture and environment in connection with a search that we are conducting.

The data may be sourced from public sites containing contact and CV data, from potential candidates directly, from tests and assessment of the Candidate's results, from interviews and interactions with potential candidates and other connected parties and from online sources and will be provided to Clients requesting such an assessment with the candidate's permission.

There are several variations of this data purpose depending on how we can use the data in the future and whether we transfer the data outside of the European Economic Area (EEA). For all data processed for the 'Executive Assessment' purposes outlined below, consent would be gained from the individual and be valid for 3 years.

- **Executive Assessment (Assignment Specific)**

Personal data is only processed for the purposes of that specific opportunity.

- **Executive Assessment (Assignment Specific & Transfer outside of EEA)**

Personal data is only processed for the purposes of that specific opportunity and the data will be transferred outside of the European Economic Area (EEA).

- **Executive Assessment (Talent Pool)**

Personal data is retained so it can be used to assess a candidate for any future opportunities.

- **Executive Assessment (Talent Pool & Transfer outside of EEA)**

Personal data is retained so it can be used to assess a candidate for any future opportunities and the data may be transferred outside of the European Economic Area (EEA).

**How do we collect information about you?**

We collect information from you in the following ways;

- Information you have provided to us either over the phone, email, via our website or in person
- Information from publicly available resources (such as LinkedIn)
- Information that another individual has supplied regarding you

**What type of information is collected about you?**

The below table gives an overview of the information we may collect about you

Information	Clients	Candidates	Employees	Suppliers
Name	✓	✓	✓	✓
Contact Information	✓	✓	✓	✓
Employment History	✓	✓	✓	✓
Education		✓	✓	
Salary Details		✓	✓	
References		✓	✓	
Interview Notes		✓	✓	
Assessments & Tests		✓		
Publicly Available Information	✓	✓		
Photo		✓	✓	
Bank Details		✓	✓	
Next of Kin			✓	
Lifestyle & Social Information		✓	✓	
Passport /Visa Information		✓	✓	
Gender		✓		
Nationality		✓		

**Who will your information be shared with?**

We may share your information with the following parties under the following conditions;

Data Subject Category	Shared with		
	Candidates	Clients	Employees
<b>Candidates</b>	Not applicable	Low-risk data (name, job title and location) may be shared with clients however consent will be gained for any medium-high risk data	✓
<b>Clients</b>	With the exception of confidential searches, client details will be shared with candidates when engaging them	Permission will be sought before sharing client details with other clients, only low risk data will ever be shared (name, contact details)	✓
<b>Employees</b>	✓	✓	✓
<b>Suppliers</b>	✓	✓	✓

For all data subject categories we may pass your information to our suppliers or third parties who process information on behalf of our behalf to help run some of our internal business operations such as IT Services and we have measures in place that requires them to keep your information secure and not to use it for their own purposes. We will share information only as anticipated within this privacy policy and wherever appropriate, try to limit disclosure to information in aggregated form, to avoid or limit identifying you personally.

Please be reassured that we will not release your information to third parties outside of Granger Reis for them to use for their own purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

### **Transferring your information outside of Europe**

We may transfer your personal information to countries outside of the European Economic Area (EEA), which do not always provide the same level of data protection as the UK, for the purposes of providing you with our products and services.

Except for low-risk, publicly available information we will only share your information outside of the EEA in one of the following circumstances;

- We have asked for your explicit consent to do so
- The organisation receiving the data has adequate protections in place in accordance with applicable laws and standards, such as;
  - Contractual arrangement with the recipient organisation ensuring the safe collection, use, retention and disclosure of personal information
  - The recipient organisation certifying to an approved mechanism for data transfers outside of the EEA such as PrivacyShield for E.U.-U.S. data transfers

We may from time to time be required to disclose information about you to law enforcement bodies, agencies or third parties under a legal requirement or court order. We act responsibly and take account of your interests when responding to any such requests.

### **How long do we keep your information for?**

The periods for which we keep your information depend on the purpose for which your information was collected, the legal basis upon which we are processing the data and the use to which it is put.

We will not keep your personal information for longer than necessary for our business purposes or for legal requirements.

### **Your rights as an individual**

Under current UK Data Protection, you are entitled to a number of rights in regards to the processing your data. For more information on these rights, please see the [ICO website](#).

### **How you can access and update your information and exercise your rights**

The accuracy of your information is important to us. If you would like to change any of the information we hold about you or if any of the other information we hold is inaccurate or out of date, please email us at: [privacy@grangerreis.com](mailto:privacy@grangerreis.com) or by writing to Granger Reis.

### **Security and Integrity of you information**

We will implement appropriate technical and organisations measures to protect against unauthorised access, loss, misuse or alternation of your information. In order to protect personal data from common cyber threats and to demonstrate our commitment to data security Granger Reis are Cyber Essentials accredited, for more information on this accreditation please visit the [Cyber Essentials website](#).



### **Profiling & Automated Decision Making**

When processing your personal information, we may undertake profiling of candidates to assess suitability for a role but we do not undertake any automated decision making which is where a decision is made solely by automated means without human involvement.

**16 or under**

Our products and services are not aimed at children aged 16 or under therefore we do process any data of this data except for the below;

<b>Employees</b>	We may hold information regarding children under age 16 in order to process employee benefits such as childcare vouchers or health insurance.
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**Use of Cookies**

Our website use cookies as they are necessary to operate our website. We also use analytical and performance cookies to assess the performance of our website, For detailed information on the cookies we use and the purposes for which we use them see our [Cookie Notice](#).

**Visitors to our website**

When someone visits [www.grangerreis.com](http://www.grangerreis.com) we may use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

**Links to other websites**

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

**Review of this Policy**

We keep this Policy under regular review. This Policy was last updated in March 2021.

Version	6.0
Written by	Chloe Bush- Head of Knowledge and Information
Approved by	Richard Milsom – Managing Partner
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